

This review matrix is intended to accompany the revised WMZ Charter Version 3 document. Charter Version 2 was approved by CMER in April 2022, and passed to Policy where it was not approved at the September 2022 meeting. Following conversation within and between Policy and CMER identified the need for revisions to the WMZ Charter Version 2 language. CMER requires that revision requests from Policy be consensus. As such, a Policy sub-group convened in February of 2023 to develop consensus revision requests. Comments made by Lori Clark in WMZ Charter Version 2 reflect the consensus revision requests of the Policy sub-group that met to discuss the WMZ Charter in February 2023.

| Line(s) | Source | Type | Comment / edit | WetSAG response |
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| 2 | Lori Clark | Comment | (DL)From the FP HCP: Like surface waters such as streams, rivers, lakes and ponds, wetlands provide important habitat for many species covered under the FPHCP. The FPHCP recognizes wetlands as important to the conservation of covered species, and it includes measures to prevent, minimize and mitigate forest practices-related impacts to wetland habitats. Measures are intended to protect important ecological functions such as LWD recruitment, shade retention, sediment filtration and the maintenance of surface and shallow subsurface hydrology. Protection measures include a wetland typing system, wetland management zones (WMZ) adjacent to Type A and Type B wetlands, and the use of low-impact harvest systems in forested wetlands. Unlike riparian protection measures, wetland protection measures do not vary by geographic region. | WetSAG presumes this comment was used to facilitate conversation at the Policy subgroup, and was not intended for further response by WetSAG. As such, WetSAG made no further response to this comment. |
| 33 | Lori Clark | Revision - insertion | Addition of clarifying text to the following sentences, which now reads, "Forest Practices Habitat Conservation Plan (FP HCP) functional objectives under the Hydrology Resource Objective for streams and wetlands as stated in Schedule L-1 include:" Inserted text indicated in red. | WetSAG accepts this revision with no further commentary. |
| 34-37 | Darin Cramer | Comment | "Hydrology resource objective relative to streams and wetlands, respectively." | The reviewer is correct that the two stated Forest Practices Habitat Conservation Plan (FP HCP) functional objectives under the Hydrology Resource Objective, (1) "Maintain surface and groundwater hydrologic regimes (magnitude, frequency, timing, and routing of stream flows) by disconnecting road drainage from the stream network", and (2) "Prevent increases in peak flows causing scour, and maintain hydrologic continuity of wetlands" refer to both streams and wetlands. No further revisions were made to the WMZ Charter in response to this comment. |
| 39-40 | Darin Cramer | Revision - insertion | Addition of clarifying text to the following sentence, which now reads, "There are two performance targets under the Hydrology Resource Objective that include stream channels and wetlands:" Inserted text indicated in red. | Similar to the comment provided on Lines 34-37, the reviewer is correct that these performance targets can apply to both channelized streams and wetlands. No further comments or edits were made by WetSAG. |
| 42-44 | Darin Cramer | Comment | "Stream channel performance target." | This comment was made in response to the Hydrology Resource Objective performance targets, which reads, "Maintain surface and groundwater hydrologic regimes (magnitude, frequency, timing, and routing of stream flows) by disconnecting road drainage from the stream network." This has now been clarified with the insertion of text on Line 39 - 40. |
| 45 | Darin Cramer | Comment | "Wetland performance target" | This comment was made in response to the Hydrology Resource Objective performance target, which reads, "No net loss in the hydrologic functions of wetlands." The reviewer is correct that performance target is specific to wetlands, and is in fact, the only wetland-specific performance target listed in Schedule L-1. Further, Schedule L-1 is in the beginning stages of being opened for revision. It is probable that the Wetland Performance Targets will be revisited and revised during that process. WetSAG will update the WMZ Charter to reflect changes in the Wetlands section of Schedule L-1 if, or when, that occurs. |
| 53-54 | Darin Cramer / Lori Clark | Comment | DC: "No specific resource objective or performance target for LWD and shade re:wetlands" LC: "pls clarify that there are no specific resource objectives..." | The reviewers are correct in stating that there are currently no wetland specific LWD and shade performance targets. The original sentence that these comments referred to read, "There is little research specific to forest practices and wetlands in the Pacific Northwest and no TFW Policy or CMER research relative to the effectiveness of forest practices WMZs for large woody debris contribution (LWD), shade, meeting water quality targets for receiving streams, or other functions." We have clarified this point, and this section now reads, "There is little research specific to forest practices and wetlands in the Pacific Northwest and no TFW Policy or CMER research relative to the effectiveness of forest practices WMZs for large woody debris contribution (LWD), shade, meeting water quality targets for receiving streams, or other functions. Importantly, there exist no current wetland-specific performance targets for shade or LWD." |
| 54 | Darin Cramer / Lori Clark | Comment | DC: "Clarify, if wetland is connected to a receiving water, is it not a typed water?" LC: "pls add additional language in charter (presentation helped to clarify)" | When multiple types of aquatic resource protections overlap, managers are required to use the one that provides the most protection for the aquatic resource. WAC 222-30-020 states, "When these [WMZ] zones overlap a riparian management zone the requirement which best protects public resources shall apply" Additional language to clarify this point has been added to Lines 56-59, which reads, "Where wetlands overlap with other aquatic resource protections (e.g., fish bearing streams) it is required to use whichever prescription that provides the most protection for the aquatic resource (WAC 222-30-020 "When these [WMZ] zones overlap a riparian management zone the requirement which best protects public resources shall apply"). For example, RMZ rules supersede WMZ rules for fish bearing waters on large forest lands. In contrast, on 20-acre except small forest landowner lands, WMZ rules supersede RMZ rules. The WMZ study focus will be restricted to only sites where WMZ rules are applied, and not sites where other resource protection rules supersede WMZ rules. Since rules differ for large and small forest landowners, this may include both fish and non-fish bearing waters. |

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| 61-62 | Darin Cramer / Lori Clark | Comment | DC: "Again, no specific objectives and targets re fish, wildlife specific to wetlands." LC: "same" | This comment is in reference to a statement that originally read, "Thus, this study will build upon the Forest Practices and Wetlands Systematic Literature Synthesis to further test whether the functional objectives for fish, wildlife, and water quality are met through the application of WMZs and BMPs for WMZ management." We have revised this to clarify that there are not wetland-specific fish, and wildlife functional objectives. This sentence now reads, "Thus, this study will build upon the Forest Practices and Wetlands Systematic Literature Synthesis to further examine how the application of WMZs and BMPs for WMZ management influence the functional dynamics of water quality, and fish and wildlife habitat. However, there are no current wetland-specific functional objectives for fish and wildlife habitat." The WMZ Charter will be revised to reflect updated Wetland Performance Targets as they are developed in the Schedule L-1 review process. |
| 71-73 | Darin Cramer / Lori Clark | Comment | DC: "I interpret this to be slightly different than how it's stated in the WAC, best to use that language while we figure out how this will be assessed." LC: "Policy will have to figure out what the WAC "means" but the Charter should stick to WAC language " | See below response to revision suggested on Lines 71-73 by Darin Cramer |
| 71-73 | Darin Cramer | Revision - insertion / deletion | Revision of original statement to better align it with established WAC language, which now reads, "The purpose of the Wetland Management Zone Effectiveness Monitoring Program is to evaluate the effectiveness of WMZs for Type A and Type B wetlands in meeting the targets outlined in the FPHCP, namely no net loss of functions of wetlands when measured over the length of a harvest rotation, although some of the functions may be reduced until the midpoint of the timber rotation cycle." Inserted text indicated in red. | WetsAG agrees that this revision brings the language into alignment with existing WAC language. |
| 71-73 | Lori Clark | Comment | Policy needs to provide clarity on the #. DNR - avg harvest age (industry analysis/ yearly report)? | This comment is in reference to the variable nature (through space and time) of harvest rotation lengths. WetsAG needs further guidance from Policy on this topic. We know that there is a temporal element in the WAC language, and that the length of time wetland functions may be degraded is tied to the midpoint of the harvest rotation. WetsAG acknowledges that agreeing to a defined rotation length is challenging and problematic. However, we do need guidance on the timeframe of interest, that is, what period of time over which we should design experiments that quantify wetland function. This needs to be in the form of a written consensus statement from Policy. There is an opportunity in the scoping document to provide more information to Policy on this issue, so that they can make a better informed decision. |
| 79 | Darin Cramer / Lori Clark | Comment | DC: "How/where WQS be assessed?" LC: "resolved" | No further action or comment by WetsAG |
| 79 | Darin Cramer / Lori Clark | Comment | DC: "What are assurance targets?" LC: "clarify" | By "assurance targets" WetsAG is referring to the US Clean Water Act assurances, as provided by the WA Dept. of Ecology. In Version 1 of the WMZ Charter this was specified. However, in Version 2 of the WMZ Charter this direct reference to the US Clean Water Act was removed. It is unclear why this edit occurred. This sentence has now been clarified, it reads, "Further, this project will evaluate if wetlands are achieving water quality standards, and US Clean Water Act assurance targets." After further discussion at CMER the sentence has been changed to "Further, this project will evaluate if wetlands are achieving state water quality standards." |
| 79-80 | Darin Cramer / Lori Clark | Comment | DC: "Is this difference than hydrologic function?" LC: "pls clarify" | WetsAG considers hydrologic connectivity as included under the broad umbrella of "hydrologic functions". However, we recognize that this sentence was not clearly constructed. It has been revised to now read, "This project will evaluate wetland functions to determine if the target of no net loss of hydrologic functions (e.g., connectivity, storage, timing, frequency, and routing of flows) are being achieved. Further, this project will evaluate if wetlands are achieving state water quality standards." |
| 87 | Darin Cramer / Lori Clark | Comment | DC: "We're using in-stream LWD target to evaluate WMZs? Is that appropriate?" LC: "clarify (decision). Seems like a Policy decision?" | As noted in previous comments and the Charter text, there are no existing Schedule L-1 targets for wetland LWD. In-stream LWD targets could be used to assess the LWD contributions of wetlands. However, in some wetland types and configurations, this may not be an appropriate metric. The Scoping document will identify when and where LWD interacts with wetlands, focusing on recruitment processes that bring LWD into wetlands. Hypotheses for targets will be identified in the Scoping process, to be tested with the WMZ study, that has yet to be scoped or designed. |
| 93-95 | Darin Cramer | Revision - insertion / deletion | Revision of original statement to better align it with established WAC language, which now reads, "Are current Forest Practice Rules-specified wetland buffers (WMZ) for Type A and B wetlands effective at meeting the Forest and Fish aquatic resource objectives and performance targets, and the goal of no-net-loss of functions when measured over the length of a harvest rotation, although some of the functions may be reduced until the midpoint of the timber rotation cycle of those wetlands by half of a timber rotation cycle?." Inserted text indicated in red. | WetsAG agrees that this revision brings the language into alignment with existing WAC language. |
| 98-100 | Darin Cramer / Lori Clark | Comment | DC: "Routine harvest practices or experimental treatments?" LC: "clarification. What is being tested? CQs are more general than Objectives." | This will be further developed within the Scoping and Study design documents. A critical first step of a WMZ research program will be assessing routine harvest practices that are in current use. However, this does not preclude the potential or need for study(s) that enact experimental harvest regimes. |
| 102 | Darin Cramer / Lori Clark | Comment | DC: "These critical questions are less specific than the objectives; most of the functions lack specific objectives and targets, some may not even be applicable; the population of interest is unclear (A&B wetlands, but only those connected to streams?); temporal component linked to harvest rotation... Lots of complexity to figure out in scoping..." LC: "resolved, need to be sorted out later" | The reviewer raises several interesting questions about research direction. WetsAG recognizes the need for clarity on these issues, but feels that would be best done within the Scoping processes. |
| 104-105 | Darin Cramer | Revision - insertion | Addition of rule context codes -010, 020 | No further action or comment by WetsAG |